

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER DISASTER
LITIGATION

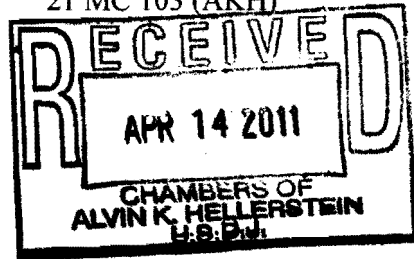
IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION

IN RE COMBINED WORLD TRADE CENTER AND
LOWER MANHATTAN DISASTER SITE LITIGATION

21 MC 100 (AKH)

21 MC 102 (AKH)

21 MC 103 (AKH)



Consistent with the Allocation Neutral's "Payment Status Report" dated March 9th, 2011, attached hereto is an exhibit containing updated data regarding the status of the claims review process and associated settlement payments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Matthew L. Garretson".

Matthew L. Garretson, Esq.
Garretson Resolution Group, Inc.
Allocation Neutral

April 13, 2011

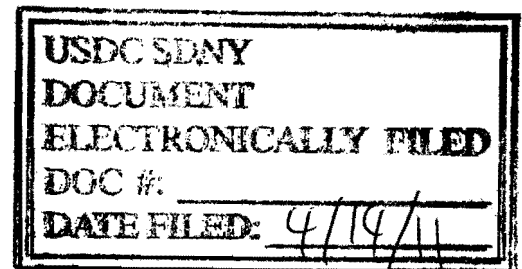


Exhibit - WTC Operational Metrics Dashboard

4/13/2011

PAYMENT INFORMATION		Primary Plaintiffs	Derivative Plaintiffs
		Payments Made	Payments Made
Initial Payments	Issue Date		
Wave 1	1/27/2011	1,548	625
Wave 2	2/2/2011	1,638	926
Wave 3	2/14/2011	1,739	959
Wave 4	3/8/2011	1,799	1,006
Wave 5	3/10/2011	1,102	590
Wave 6	3/16/2011	614	321
Wave 7	3/23/2011	588	350
Wave 8	3/30/2011	466	256
Wave 9	4/6/2011	129	65
Wave 10	4/13/2011	52	25
Other Waves - TBD		TBD	TBD
**** Totals To Date		9,675	5,123
Tier 2 - Accelerated Final Payments	Issue Date		
Wave 8	3/30/2011	125	75
Wave 9	4/6/2011	546	321
Wave 10	4/13/2011	116	58
Other Waves - TBD		TBD	TBD
**** Totals To Date		787	454
Tier 3 - Accelerated Final Payments	Issue Date		
Wave 8	3/30/2011	42	22
Wave 9	4/6/2011	123	75
Wave 10	4/13/2011	37	20
Other Waves - TBD		TBD	TBD
**** Totals To Date		202	117
Tier 4 - Interim Payments	Issue Date	Estimated Start - week of 5/30/11	
First wave - TBD		TBD	TBD
Other Waves - TBD		TBD	TBD
Tier 4 - Final Distribution Payments	Issue Date	Estimated Time - December, 2011	
All 21mc100 Plaintiffs - TBD		TBD	TBD
All 21mc102 Plaintiffs - TBD		TBD	TBD
All 21mc103 Plaintiffs - TBD		TBD	TBD

Exhibit - WTC Operational Metrics Dashboard

4/13/2011

Other Elements of Recovery		Primary Plaintiffs	Derivative Plaintiffs
		Payments Made	Payments Made
Permanent Disability Fund Awards	Issue Date	Estimated Time - Q3, 2011	
Single Payment Wave - TBD		TBD	TBD
Mixed Orthopedic Injury Payments	Issue Date	Estimated Time - Q3, 2011	
Single Payment Wave - TBD		TBD	TBD
Qualifying Surgery Payments	Issue Date	Estimated Start - week of 4/25/11	
First wave - TBD		TBD	TBD
Other waves - TBD		TBD	TBD
Marine Insurers' Payments	Issue Date	TBD	
**** Grand Totals To Date		10,664	5,694

Ability to make payments subject to deficiency cures, reconsiderations and appeals

EXPENSE AUDIT INFORMATION	
No. of firms in settlement	26
No. of claimants selected for random audit	455
No. of audits completed	446
% of completion	98%
No. of firms remaining to submit requested data	6

RANDOM AUDIT (Medical Records)	
No. of firms in settlement	26
No. of claimants selected for random audit	319
No. of cases with all medical records reviewed	53
% of completion (case complete and RA complete)	17%

LIENS	# Claimants Entitlement Status Verified	# Claimants Entitled To Medicaid	# Liens Waived or completed at \$0	# Liens Pending ****
Medicare ** obtained full waiver from Medicare**	N/A	Full Waiver	N/A	N/A
Medicaid	9,146	1,049	1,035	27
**** Most Medicaid liens not yet resolved are due to discrepancies in plaintiff identification information; pending correction by plaintiff's counsel				
	# Liens Reported	# Liens Waived or Discharged	# Liens Resolved at \$0	# Liens Pending ****
Workers' Comp	1,070	582	57	431
*** Remaining Workers' Comp Liens will be resolved once gross award is determined				

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4/13/2011

MEDICAL RECORD REVIEW	Determination Notices Issued	Deficiencies Issued*
Tier-2	1,419	108
Tier-3	535	77
Tier-4	2**	9**

* Does not include deficiencies that have been responded to and are in the process of being reviewed for cure

**Tier-4 medical record reviews are well underway. Deficiency notifications and Determination Notices began to be issued the week of 4/11 and will continue on a rolling basis

CLAIMS SUBMISSION	
# of officially submitted claims	10,114
# of claims yet to be submitted	0
# of claims not expected to be submitted	2
% of completion (of expected claims)	100.0%
Opt-In total (confirmed by the Parties)	10,116

Overall Claim Milestone Status	# Not Complete (Reasons for non-payment)	Explanation
Stipulation of Dismissal	11	Stipulations of Dismissal Not Received per Exhibit T
Opt-In Documents	82	Originals Not Received by WTC Captive
Claim Submission	50	Claim submission end date 3/28/11. Breakdown of the 50: 2 claim forms not received; 35 claim form discrepancies; 7 claim form deficiencies; 6 incomplete claim forms
Work Verification	13	Not Received or Contain Deficiencies or Discrepancies
Lien Resolution	87	Medicaid and/or Workers Comp Liens have been identified and are not yet resolved. Excludes WGENB
Payment Audit	9	Awaiting information/documentation to complete payment audit
Plaintiff Identification Number	3	No Social Security Number or Alternate ID number has been provided

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4/13/2011

Estate or Other Lien Documentation (if applicable)	215	Need additional documentation (court Orders, etc.) before funds can be released
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